

THE CHARRINGTON FIRM, P.C. Attorneys and Counselors at Law

One Cross Island Plaza
Suite 229
Rosedale, New York 11422
(718) 528-4422 Fax: (718) 528-4420

11 Broadway
Suite 615
New York, New York 10004
(*New York City Office*)

June 20, 2024

Hon. Justice Pamela K. Chen
United States District Court
Eastern District of New York
Courtroom: 4F
225 Cadman Plaza East
Brooklyn New York 11201

Re: IME WatchDog, Inc. v. Gelardi, et al.
Case No.: 1:22-cv-1032 (PKC) (JRC)

Dear Honorable Pamela Chen:

As the Court is aware, this office represents Eugene Liddie, a non-party in the above-referenced action. After the denial of Plaintiff's letter motion for a TRO, this office was not served with advance notice of Plaintiff's intent to file a new application for a TRO other than its filing on ECF on June 19, 2024. We respectfully object to the issuance of a temporary restraining order against IME Legal Reps and/or Eugene Liddie without a further briefing and/or hearing. Alternatively, Mr. Liddie respectfully requests an opportunity to, at least, be heard if the Court intends to issue an Order relating to Plaintiff's application prior to the August 5, 2024 hearing date in this matter or prior to the filing of Mr. Liddie's opposition to the application. Non-party Eugene Liddie is amenable to an earlier date if the Court sees fit.

Mr. Liddie and this office are preparing its response to Plaintiff's application but seek to make the Court aware of Mr. Liddie's request to be heard prior to the issuance of an Order as to the TRO.

Furthermore, the issues alleged within Plaintiff's motion raise the same facts and allegations raised within its previously filed letter motion, thus Mr. Liddie renews his position stated in his June 17, 2024 letter (ECF No. 350) and incorporates the same herein until his formal response is filed.

Respectfully Submitted,

/s/

Karen H. Charrington, Esq.

cc:

Emanuel Kataev, Esq. emanuel@sagelegal.nyc – via ECF

Jamie Scott Felsen, Esq. jamiefelsen@mmlaborlaw.com - via ECF

Jonathon D. Warner, Esq. jdwarner@warnerandscheuerman.com - via ECF